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SIGNATURE PAGE]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LD, DB, BW, RH and CJ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UNITED BEHAVIORAL HEALTH, a
California Corporation,
UNITEDHEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation, and
MULTIPLAN, INC., a New York corporation,

Defendants.

CASE NO. 4:20-cv-02254-YGR

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO PERMIT CERTAIN
DEPOSITIONS FOLLOWING CLOSE OF
DISCOVERY**

Hon. Yvonne Gonzalez Rogers

Complaint filed: April 2, 2020

Third Amended Complaint filed: Sept. 10, 2021

Under Civil Local Rule 6-2 and 7-12, all parties in this case hereby stipulate and agree to permit the depositions of certain witnesses following the close of discovery until July 29, 2022, without modification of any other dates in the current schedule, subject to this Court's approval. The parties have met and conferred and agreed on the following proposal. For the reasons set out below, the parties respectfully submit that extraordinary and compelling reasons warrant this slight modification to the existing schedule (Dkt. 130).

In further support of this Stipulation, the Parties state as follows:

WHEREAS, the Court entered its Order on April 21, 2022 (Dkt. 130) extending the non-expert discovery cutoff to July 15, 2022 and otherwise extending case deadlines relating to briefing on class certification, and providing that "[n]o further extensions will be granted absent extraordinary and compelling reasons," (Dkt. 130 at 6);

WHEREAS, the parties are on track to substantially complete fact discovery by the existing deadline, including many thousands of documents and data already produced, including, most recently, United's June 23, 2022 production of 8,452 pages of documents and privilege log containing 1,278 entries, and fourteen depositions to be taken (six depositions already taken and eight more scheduled prior to the existing deadline);

WHEREAS, the parties have also conducted substantial third-party discovery, including document subpoenas to several dozen third parties;

WHEREAS, the parties also have one discovery dispute on file with the Court that has not yet been decided (Dkt. 120);

WHEREAS, notwithstanding the efforts described above, due to scheduling constraints, the parties anticipate needing to complete the depositions of a limited number of additional witnesses during the second half of July, with the permission of the Court, including (1) UHC witness Radames Lopez; (2) the Rule 30(b)(6) designees for a limited number of treatment centers; (3) third party Creyna Franco; (4) one Rule 30(b)(6) designee for MultiPlan; and (5) a limited number of third-party plan sponsors;

WHEREAS, the Court has granted two previous extensions to the deadline that is the subject of this stipulation (Dkt. 115; Dkt. 130);

WHEREAS, granting leave to take these depositions after the close of non-expert discovery will not alter any other dates in the schedule this Court set by its Order of April 21, 2022 (Dkt. 130);

WHEREAS, nothing in this Joint Stipulation alters any other rights, and the parties expressly reserve the right to seek further relief from the Court as necessary;

NOW, THEREFORE, subject to the approval of the Court, and for good cause shown, the parties hereby stipulate and agree to permit the parties to take the following depositions after the close of discovery and before July 29, 2022:

- UHC witness Radames Lopez;
- the Rule 30(b)(6) designees for a limited number of treatment centers;
- third party Creyna Franco;
- one Rule 30(b)(6) designee for MultiPlan; and
- a limited number of third-party plan sponsors.

A proposed order is submitted concurrently.

IT IS SO STIPULATED.

DATED: June 28, 2022

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Geoffrey Sigler
Geoffrey Sigler

Attorneys for Defendants UNITED BEHAVIORAL
HEALTH and UNITED HEALTHCARE INSURANCE
COMPANY

DATED: June 28, 2022

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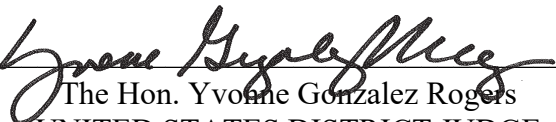
~~[PROPOSED]~~ ORDER

Having considered the parties' Joint Stipulation and ~~[Proposed]~~ Order to Permit Certain Depositions Following Close of Discovery, the Court HEREBY ORDERS as follows:

The parties may take additional depositions after the close of discovery until July 29, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 8, 2022


The Hon. Yvonne Gonzalez Rogers
UNITED STATES DISTRICT JUDGE